

AirTran Airways has reviewed the Notice of Proposed Rulemaking (NPRM) 2006-NM-191-AD under Docket FAA-2006-26048. This NPRM proposes replacing certain attaching hardware of the bulkhead nipple assemblies of the left and right wing vent boxes with new electrical bonding attaching hardware, doing resistance testing of the new electrical bonds, and doing fuel leakage testing of the reworked nipple assemblies. The proposed actions are in accordance with Boeing Service Bulletin 717-28-0011, Revision 2, dated July 19, 2006.

AirTran appreciates the opportunity to comment publicly on this NPRM, and offers the following:

This NPRM affects eighty B717-200 aircraft currently in service at AirTran Airways.

It is noted that the subject Service Bulletin 717-28-0011 figure 1 calls for a check of electrical bond, referring to SWPM 20-50-01 Class "L". The referenced section of the Standard Wiring Practices Manual does not identify a Class "L" but rather provides a maximum DC resistance and path for lightening protection. AirTran requests clarification of Class "L" in the final rule. (Ref Docket FAA-2006-24256 for similar item in SB 717-28-0004).

In addition, AirTran notes that the proposed rule changes the compliance time from the 10 years that is recommended in the Service Bulletin. The NPRM states that, due to the nature of the unsafe condition, 78 months after the effective date of the proposed AD is the appropriate compliance time and that the FAA has coordinated this difference with Boeing. AirTran suggests that the Service Bulletin be revised to also reflect the 78 month time frame to match the final rule.

Due to the potential of high amperage lightning-induced currents not being able to dissipate properly through adequate bonding and create an ignition source for fuel vapors inside the wing vent boxes, AirTran Airways supports the proposed actions described in this NPRM